

EXHIBIT E

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

REGINA JACKSON AND RUDOLF) Docket No. A 10-CA-522 SS
WILLIAMSON, INDIVIDUALLY)
AND ON BEHALF OF THE ESTATE)
OF RACHEL JACKSON, DECEASED)
vs.) Austin, Texas
JOHN S. FORD, M.D. AND)
TRAVIS COUNTY, TEXAS) January 25, 2012

TRANSCRIPT OF TRIAL ON THE MERITS
BEFORE THE HONORABLE SAM SPARKS
Volume 3 of 4

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I N D E X

	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
<u>Witnesses:</u>				
Rudolf E. Williamson	7	15, 23		
D'Ambra S. Jackson	47	59, 65		
Diana Gonzalez			70	82, 82
Ricky Hollis	92	96		
Jeffrey Barnard	102	127, 130	139	140, 143
Joseph V. Penn	145	187, 193	215	217
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14:18:52 1 National Commission on Correctional Healthcare, NCCHC, does, and
14:18:56 2 you have to study and take an exam and you have to show that
14:19:01 3 you've been working in a prison or jail setting seeing patients
14:19:04 4 for a period of time. I think it's either three or five years.
14:19:06 5 And then, every year, you have to recertify. You have to show
14:19:09 6 that you're doing CME, continuing medical education, that you're
14:19:13 7 going to conferences that are geared at correctional health
14:19:16 8 issues. And then, you have to submit a reapplication to get
14:19:20 9 recertified every year.

14:19:21 10 Q. So in addition to being a board-certified psychiatrist, do
14:19:24 11 you consider yourself with specific emphases in the correctional
14:19:32 12 healthcare system?

14:19:34 13 A. Yes, I do.

14:19:34 14 Q. I think I mentioned when you started, I have retained you as
14:19:41 15 an expert in this case, correct?

14:19:43 16 A. That's correct.

14:19:43 17 Q. Which means I am paying you to be here?

14:19:46 18 A. Well, my understanding, you're not paying me, but the agency
14:19:49 19 that's defending or the insurance medical malpractice entity
14:19:53 20 that's the claim -- the insurance company that Dr. Ford had or
14:20:00 21 has is the one that's paying me for my time.

14:20:04 22 Q. How much money are you being paid per hour, sir?

14:20:06 23 A. Yes. It's \$350 an hour.

14:20:09 24 Q. And do you know, as we sit here today, how much you have
14:20:12 25 billed?